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December 15, 2023

Honorable Lee G. Dunst  
United States District Court for the Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722  
By: ECF

RE: Valenti v. Ryder et al  
Docket No. 19-cv-03990-GRB-LGD

Dear Judge Dunst:

The firm of Harfenist Kraut & Perlstein (“HKP”) represents Plaintiff and Defendants are represented by the Office of the Nassau County Attorney.

The parties write in connection with the Court’s Order of October 24, 2023 which required the parties to file a Joint Pre-Trial Order by December 15, 2023 and set the matter down for a Pre-Trial Conference on January 4, 2024.

As the Court may be aware, the parties filed a briefing schedule related to Rule 56 motions which was So-Ordered by Judge Brown on December 6, 2023. As the parties anticipate that Judge Brown’s determination of the Rule 56 motions may limit the claims which will proceed to trial, it is respectfully requested that the Court defer the submission of the Joint Pre-Trial Order and the scheduling of the Pre-Trial Conference until after the determination of the motions.

The parties thank the Court for its understanding in this matter.

Respectfully Submitted,  
HARFENIST KRAUT & PERLSTEIN, LLP

By: Neil Torczyner  
Neil Torczyner